

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 24-20466-CR-SCOLA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

TIRON ALEXANDER,

Defendant.

/

**RESPONSE IN OPPOSITION TO GOVERNMENT'S MOTION TO
CONTINUE TRIAL BY 14 DAYS**

Mr. Alexander, by and through undersigned counsel, and at the Court's direction, DE 23, files this response in opposition to the government's request for continuance.

1. On March 12, 2025, this Court set this matter for trial to begin on April 21, 2025, with Calendar Call set for April 15, 2025. (DE 17).
2. Since that time, as in any case, the parties have conferred about the matter; for instance, undersigned has made a number of discovery requests, to which the government has responded. There was also a brief period of less than a week during which undersigned made an attempt to reach a resolution of this case, asking the government to consider pretrial diversion. The government declined and never did make any offer at all, let alone an offer like pretrial diversion that would *not* require a plea. Ultimately, conferral regarding a possible resolution was brief and preliminary in nature.

3. At no point did defense counsel communicate that this case was going to resolve by a guilty plea, nor did defense counsel ever make any representations that would suggest to the government that it need not prepare for the trial date set by this Court. To the extent the government suggests otherwise, this is incorrect.
4. On April 8, 2025, the government emailed seeking the defense's position on a motion to continue. Though not noted in the government's motion, defense counsel replied by email that while she ordinarily would have no opposition, given the present challenges facing Mr. Alexander, who is struggling with housing insecurity, that the defense did oppose a continuance.
5. Also in that email, and not noted in the government's motion, defense counsel advised that she would be asking for trial to begin the second week because co-counsel, Assistant Federal Public Defender Paul Carson, has mandatory military training scheduled for the week of April 21.
6. At this point, Mr. Alexander is entitled to have his trial, and he is requesting that it proceed. Because there exists no good cause for the sought continuance, and because Mr. Alexander seeks to resolve this matter, Mr. Alexander, through counsel, respectfully opposes the government's request for continuance.

WHEREFORE, Tiron Alexander, through undersigned counsel, respectfully requests that this Court deny the government's request for continuance.

Respectfully submitted,

HECTOR A. DOPICO
FEDERAL PUBLIC DEFENDER

By: /s/Eboni Blenman
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CERTIFICATE OF SERVICE

I HEREBY certify that on April 14, 2025, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record or *pro se* parties, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

/s/Eboni Blenman
Eboni Blenman